

PD4 Exh 4

1                   UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF OHIO  
2                   EASTERN DIVISION

4 IN RE: NATIONAL )  
PRESCRIPTION ) MDL No. 2804  
OPIATE LITIGATION )  
5 \_\_\_\_\_ ) Case No.  
 ) 1:17-MD-2804  
6 )  
THIS DOCUMENT RELATES ) Hon. Dan A.  
7 TO ALL CASES ) Polster

FRIDAY, JULY 13, 2018

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
CONFIDENTIALITY REVIEW

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1 that it should not happen.

2 MR. FULLER: Evan, let's go to  
3 macro number 2.

4 QUESTIONS BY MR. FULLER:

5 Q. This is the suspicious order  
6 reporting but this time for a [REDACTED]

[REDACTED].

8 Do you see that?

9 A. I do.

10 Q. And then the order is for the  
11 [REDACTED] same address, same  
12 customer DEA number, right?

13 A. Yes, I agree. Yes.

14 MR. FULLER: If you move to the  
15 right for me.

16 QUESTIONS BY MR. FULLER:

17 Q. And the date of the suspicious  
18 order report or overage is [REDACTED]

[REDACTED]

[REDACTED]

21 Do you see that?

22 A. I do.

23 Q. Now, you would expect to see  
24 some sort of explanation again in the  
25 diligence file; is that right?

1 MS. WICHT: Object to the form  
2 of the question and no foundation.

3 THE WITNESS: It should be  
4 there.

5 QUESTIONS BY MR. FULLER:

6 Q. Okay. And was that your  
7 standard practice?

8 If you were going to change a  
9 threshold or if you were going to clear  
10 something or allow future shipments to go  
11 through, you would have documented your  
12 reasoning behind that, why you were doing  
13 that?

14 MS. WICHT: Object to the form  
15 of the question.

16 QUESTIONS BY MR. FULLER:

17 Q. Correct?

18 A. I should have, yes.

19 Q. That was your normal procedure?

20 A. Yes, that would have been what  
21 I should have done, yes.

22 Q. Okay. And you -- sitting here  
23 today, you don't know whether you did or  
24 didn't?

25 A. I have no idea whether I did or